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May 20, 2021

By ECF

The Honorable William F. Kuntz, II
United States District Judge
United States District Court for the
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Gorgi Naumovski, No. 20 Cr. 384 (WFK)

Dear Judge Kuntz:

Further to a telephone conversation that the parties had yesterday afternoon with the Court's Case Manager Ms. Alexis Love, I write to respectfully request an adjournment of the June 10, 2021 status conference that is currently scheduled in this matter. The government, through Trial Attorney Andrew Estes of the United States Department of Justice, has no objection to this request.

The reason for the requested adjournment relates primarily to the voluminous amount of discovery that the government has thus far produced in this matter. In particular, the government's productions to date consist of over 3.8 million pages of documents, as well as extensive electronic materials, including the entirety of multiple computer servers. Our review of these materials is ongoing, and we have been discussing the productions and the case with Mr. Estes in an effort to identify the documents most relevant to our review. However, given the massive size of the materials provided, we expect that it will take us a considerable amount of time to review the discovery, assess the government's evidence, and arrive at an appropriate path forward.

So as to allow our review of the discovery to continue in the manner described above, we submit that an adjournment of at least approximately three months—that is, until approximately September 10, 2021—is appropriate under the circumstances. While the volume and complexity of the materials we are reviewing makes it difficult to know how far we will have progressed

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through those materials by this time period in September, we expect such an adjournment will at least allow us to make further progress, about which the parties may then report to the Court at the rescheduled status conference we respectfully propose herein.

Again, as noted, the government has no objection to the adjournment requested by this letter. Further, given that the purpose of the adjournment request is to permit the defense to review discovery, and also in light of the complexity of this case, we consent on Mr. Naumovski's behalf to the exclusion from Speedy Trial calculations of the time between now and the next status conference.

We thank the Court for its consideration of this request.

Respectfully submitted,

/s/
Robert M. Radick
Chelsea L. Scism

cc: Andrew Estes, U.S. Department of Justice (by ECF and email)